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July 14, 2021

VIA ECF

Hon. Analisa Torres, United States District Judge United States District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse

Re: Catahan et al v. Eco Community Cleaners Inc. et al, 20 CV 1749 (AT)

Dear Judge Torres:

This firm represents the plaintiff in the above-referenced action. The plaintiff moves for an extension of the July 8, 2021, deadline to submit a revised order to show cause for default judgment in this matter, *nunc pro tunc*, from July 8, 2021, to today.

The plaintiff apologizes to the Court for not timely filing the revised order to show cause. The mistake was due to law firm error whereby this firm's paralegal failed to calendar the deadline. This attorney acknowledges that to live and die by the calendar is improper, and that this attorney is ultimately responsible for failing to abide by the Court's deadlines. It was an entirely accidental mistake, and this attorney did not mean to willfully disobey the Court's directive. I again apologize to the Court for this error. As soon as I realized the error, I immediately filed the corrected order to show cause and accompanying affidavit, affirmation, and exhibits.

The plaintiff further asks until Monday, July 19, 2021, to serve the motion and file a certificate of service because this attorney will be out of the state and working remotely until that day and will not have access to a printer and postage.

I thank the Court for its time and consideration.

GRANTED in part, DENIED in part. Plaintiff's request to extend the deadline *munc pro tunc* to submit a revised proposed order to show cause to **July 14, 2021**, is GRANTED. Plaintiff's request to extend the deadline for service of the motion and filing of proof of service is DENIED as untimely.

SO ORDERED.

Dated: July 21, 2021

New York, New York

ANALISA TORRES United States District Judge